

# White and Williams LLP



*LibertyView*  
457 Haddonfield Road, Suite 400  
Cherry Hill, NJ 08002-2220  
Phone: 856.317.3600  
Fax: 856.317.1342

*Deborah A. Crinigan*  
Direct Dial: 215.864.7194  
Direct Fax: 215.789.7694  
*crinigand@whiteandwilliams.com*

*Christopher P. Leise, Managing Partner*  
Certified Civil Trial Attorney

November 30, 2010

**By Electronic Case Filing and Facsimile 973-645-5904**

The Honorable Susan D. Wigenton, U.S.D.J.  
M.L. King, Jr. Federal Bldg. & Courthouse, Room 5060  
50 Walnut Street  
Newark, N.J. 07102

**RE: Stephen D. Prystowsky, et al. v. TGC Stores, et al.**  
**U.S. District Court for the District of N.J., Civil Action No. 2:07-cv-00072**  
**(SDW)(MCA)**

Dear Judge Wigenton:

This office represents Plaintiffs, Stephen D. Prystowsky, Eric N. Prystowsky and Michael Prystowsky in the captioned matter. I write to request an extension of the deadline for Plaintiffs' response to the Motion for Summary Judgment filed late last Wednesday, November 24, by Defendant, Pride Mobility Products Corp .

Under the timetable established pursuant to Local Rule 78.1(a), Plaintiffs' opposition papers would be due by December 6, and the Motion would be returnable on December 20. The Motion, however, raises significant questions regarding the statute of limitations and the discovery rule which to be properly addressed warrant the granting of additional time.

Counsel for Pride Mobility Products, Neil Sambursky, Esquire, and I have amicably agreed upon a tentative briefing schedule that would permit Plaintiffs to fully address the arguments raised by the Motion and which would also accommodate all counsel's schedules and vacation plans. The agreed-upon schedule calls for Plaintiffs to file their opposition by January 24, 2011, for Pride Mobility Products to file a reply brief by February 14, and for the Motion to be returnable on the March 7 motion day.

The Court has set no deadline for dispositive motions in this case. Such a deadline is to be among the topics to be discussed with Judge Arleo during the upcoming December 16 case management conference.

Allentown, PA • Berwyn, PA • Boston, MA • Cherry Hill, NJ • Conshohocken, PA  
New York, NY • Paramus, NJ • Philadelphia, PA • Pittsburgh, PA • Wilmington, DE

6972854v.1

LIMITED LIABILITY PARTNERSHIP REGISTERED IN PENNSYLVANIA

The Honorable Susan D. Wigenton, U.S.D.J.  
November 30, 2010  
Page 2

Kindly advise if counsel's proposed briefing schedule would be acceptable to the Court.

Thank you.

Respectfully submitted,

WHITE AND WILLIAMS LLP

By: /s/ Deborah A. Crinigan  
Deborah A. Crinigan, Esquire

DAC:ajc

cc: Neil L. Sambursky, Esquire (by Electronic Case Filing and e-mail)  
Charles C. Eblen, Esquire (by Electronic Case Filing and e-mail)  
Charles Simmons, Esquire (by Electronic Case Filing and e-mail)